



Algona-Pacific
Auburn
Bellevue
Black Diamond
Bothell
Boulevard Park
Burien
Carnation
Covington
Des Moines
Duvall
Enumclaw
Fairwood
Fall City
Federal Way
Federal Way 320th
Foster
Greenbridge
Issaquah
Kenmore
Kent
Kingsgate
Kirkland
Lake Forest Park
Lake Hills
Library Connection @ Crossroads
Library Connection @ Southcenter
Library Express @ Redmond Ridge
Maple Valley
Mercer Island
Muckleshoot
Newcastle
Newport Way
North Bend
Redmond
Renton
Renton Highlands
Richmond Beach
Sammamish
Shoreline
Skykomish
Skyway
Snoqualmie
Valley View
Vashon
White Center
Woodinville
Woodmont

July 2, 2014

Mr. Tom Wheeler
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman and Commissioners,

King County Library System (KCLS) operates 48 branches across 2,100 square miles of urban and suburban King County, providing library services to a widely diverse population of 1.3 million users.

As one of the busiest library systems in the United States, KCLS welcomed nearly 10 million visitors to its libraries in 2013, many from rapidly growing immigrant and refugee populations and lower income suburban/rural areas, who use the library to access resources on the Internet.

Based on the Federal Communication Commission's proposed formula to cap e-Rate funding for public libraries at \$1 per square foot, KCLS would receive a mere \$730,000. Needless to say, costs associated with providing wireline and Wi-Fi access (equipment, maintenance, licenses, support staff, etc.) greatly exceed that figure for a library system the size of KCLS.

Using square footage as the basis for a funding formula ignores the fact that Wi-Fi users access the Internet from points *outside* the physical walls of a library, creating a commensurate increase in demand that is not quantified using the proposed formula.

In concurrence with other member libraries of the Urban Libraries Council, King County Library System proposes that e-Rate funding for public libraries be based on one of two formulas:

- 1) At a rate of no less than \$4 per square foot;
- or —
- 2) At a rate of \$150 per average daily visitor.

Robust E-rate funding is critical to KCLS' ability to provide wireline and wireless Internet access for its patrons, especially for many in low-income communities who do not have access to this vital service.

Sincerely,

A handwritten signature in black ink that reads "Julie Brand Acteson". The signature is fluid and cursive, with a long horizontal line extending from the end.

Julie Brand Acteson
Interim Library Director